

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

No. 4:16-cr-40031-TSH-1

JAMES E. LEVIN, ET AL.

**DEFENDANT'S MOTION TO MODIFY CONDITIONS OF RELEASE
TO PERMIT HIM TO CHANGE HIS RESIDENCE**

The defendant, James Levin, by and through undersigned counsel, hereby respectfully moves this Honorable Court to modify his conditions of release, which currently require him to maintain his residence in Millis, MA, to allow him to reside pending sentencing in Nantucket, MA. As grounds therefor, the defendant has been asked to vacate his current residence by the end of the month and his brother has agreed to allow him to reside at his vacation home in Nantucket, which is presently unoccupied. U.S. Probation Officer Victor Canino, who currently supervises the defendant, has been made aware of the address and location of the home the defendant requests he be permitted to move to, and has no objection thereto. Counsel for the government, AUSA Michelle Dineen Jerrett, takes no position on the defendant's motion.

WHEREFORE, undersigned counsel respectfully requests this Court modify his conditions of release as set forth herein.

Dated: November 18, 2020

Respectfully submitted,
JAMES LEVIN
By and through his attorneys,

/s/ R. Bradford Bailey
R. Bradford Bailey, BBO#549749
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Certificate of Service

I, R. Bradford Bailey, hereby certify that on this the 18th day of November, 2020, I caused a true copy of the foregoing motion to be served upon all necessary parties to this matter by virtue of electronically filing the same via the CM/ECF system.

/s/ R. Bradford Bailey
R. Bradford Bailey